

## **EXHIBIT G**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)  ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)  ECF Case

**DECLARATION OF HIPOLITO D'OLEO**

I, Hipolito D'Oleo, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a naturalized citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my Certificate of Naturalization.

3. On September 11, 2001, I worked as a maintenance employee with American Building Maintenance (ABM) Industries in the South Tower of the World Trade Center (WTC). Attached as Exhibit B to this Declaration is a true and correct copy of my proof of presence at the WTC at the time of these terrorist attacks.

4. On the morning of September 11, 2001, I had been working to replace the paper towels in the dispensers in a bathroom on the South Tower's 85th floor. Inside the windowless

bathroom, I had been oblivious to the events taking place outside. A building mechanic rushed into the bathroom screaming "Fire! Fire!" We ran towards the nearest exit stairwell and I began to descend the concrete steps to escape from the building. As I descended the stairs, more and more people entered the stairwell at each landing in an effort to escape from the building. The descent became slow and difficult.

5. At approximately the 40th floor, I felt the building rumble and shake. In retrospect, I now know that the rumbling was likely the sound of the second passenger jet, United Airlines Flight 175, colliding with the upper section of the South Tower. People in the stairwell began to panic and scream, and they began to run down the stairs.

6. Despite the chaos in the stairwell and my slow rate of descent, I finally arrived in the lobby area of the South Tower. I helped a coworker search for his wife, and then my supervisor directed me to go to 140 Broadway Street so that the ABM team could formulate a plan to help clean up the South Tower.

7. As I left the building and walked towards Broadway Street, the South Tower began to collapse behind me. I started to run away from the area to avoid the dust cloud and falling debris, but I fell near One Chase Plaza. I stumbled to my feet and continued to run away from the area to flee from the large cloud of smoke and debris that was headed towards me. I fell a second time and injured my shoulder and my hand as the right side of my body slammed against the pavement. Before I could get back on my feet, the massive cloud of smoke and debris engulfed me. Due to the thickness of the debris cloud, I struggled to breathe despite having covered my face.

8. Despite my injuries to my right shoulder and my right hand, I managed to stand up. I walked aimlessly in the dark dust cloud and I bumped into walls and other people due to the zero visibility conditions.

9. Once the smoke had cleared, I walked towards my home located in the Bronx. I passed by two hospitals on my way home, but I did not stop as these facilities were surrounded by hundreds of people. I finally reached my home in the Bronx at 4:30 p.m. that day. Within two days of the events of 9/11, I sought initial treatment for my injuries at the Metropolitan Hospital Center's Emergency Room.

10. The carnage from September 11, 2001, is emblazoned in my memory. During the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. I was surrounded by death, debris, fire, and smoke. The situation could only be compared to a war zone.

11. As a result of these terrorist attacks, I suffered the following injuries<sup>1</sup> on September 11, 2001: right shoulder derangement with traumatic tendinitis<sup>2</sup>, and a right-hand injury (index finger-second metacarpophalangeal joint contusion and derangement)<sup>3</sup>. I also suffered, and continue to suffer, from Post Traumatic Stress Disorder (PTSD)<sup>4</sup> due to my experience on 9/11.

12. Attached as Exhibit C to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my injuries following the September 11, 2001, terrorist attacks.

13. I previously pursued a claim (Claim Number 212-000561) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

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<sup>1</sup> See, 9/11 Injury Records of Hipolito D'Oleo (DOLEO\_MEDS\_0001), attached hereto as Exhibit C, at 0001-0023.

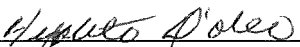
<sup>2</sup> *Id.* at 0003, 0005-0018, and 0020-0023.

<sup>3</sup> *Id.* at 0003, 0005-0010, 0013-0018, and 0022-0023.

<sup>4</sup> *Id.* at 0010, 0014-0015, and 0017.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 13 day of November 2023.

  
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Declarant Hipolito D'Oleo

**EXHIBITS  
FILED  
UNDER SEAL  
(ECF No.  
5716)**